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## **Amendments to the Drawings:**

Please add the three attached new sheets corresponding to FIGS 15, 16, and 17.

Attachment: Three Sheets of New Drawings

## **REMARKS**

The drawings have been objected as failing to comply with 37 CFR 1.84(p)(5), and failing to include the following reference sign(s) mentioned in the description: S31-S35 and S42-S46.

In the drawings, FIGS. 15 to 17 have been added, and include reference signs S31-S35 and S42-S46.

Further, the drawings have been objected as failing to comply with 37 CFR 1.84(p)(5), and including the following reference character(s) not mentioned in the description: 3a, 6, 8, 12, 14, 16, 17, 21, 21a, 21b, 22, 126, 135, 176, 180, and 190.

The specification has been amended so as to add the reference character(s) in the specification.

The examiner has rejected claim 1-2 under 35 U.S.C. 102(b) as being anticipated by applicant's admitted prior art. Claims 1 and 2 have been amended.

The present inventions defined in currently amended claims 1 and 2 are patentably distinguishable over the prior art by the following reasons.

The constituent features of the surveillance camera apparatus defined in currently amended claim 1 are as follows:

- (a) a housing assembly having a slanted plate portion with an inner surface; and
- (b) a camera assembly accommodated in the housing assembly, the slanted plate portion defining an opening therein, the opening having a central axis thereof, the opening having an imaginary inner surface flush with the inner surface of the slanted plate portion, and the imaginary inner surface of the opening having the shape of a circle,

the surveillance camera apparatus being characterized in that the camera assembly includes:

- (b1) a stationary member;
- (b2) a pan shaft having a pan axis thereof, the pan shaft being supported by the stationary member to be revolvable around the pan axis;
- (b3) a retaining member integrally formed with the pan shaft;
- (b4) a tilt shaft having a tilt axis thereof, the tilt shaft being retained by the retaining member to be revolvable around the tilt axis under the state that the tilt axis of the tilt shaft is in perpendicular relationship with the pan axis of the pan shaft:
- (b5) an imaging unit for taking an image of a specific object through the opening of the slanted plate portion, the imaging unit having a light axis thereof, the imaging unit being integrally supported by the tilt shaft under the state that the light axis of the imaging unit is in perpendicular relationship with the tilt axis of the tilt shaft;

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- (b6) a pan motor for having the pan shaft driven around the pan axis; and
- (b7) a controlling unit for controlling the pan motor to allow the imaging unit to be pivotally moved around the pan axis of the pan shaft within a range depending on the shape of the opening.

From the element (b7) of currently amended claim 1, it will be understood that the surveillance camera apparatus comprises a controlling unit for controlling the pan motor to allow the imaging unit to be pivotally moved around the pan axis of the pan shaft within a range depending on the shape of the opening. This leads to the fact that the surveillance camera apparatus can allow the imaging unit to be moved around the pan axis of the pan shaft in consideration of a dead angle without preventing the imaging unit from taking the image of the object through the opening of the slanted plate portion of the housing assembly.

On the other hand, the applicant's admitted prior art discloses a surveillance camera apparatus comprising a housing assembly and a camera assembly accommodated in the housing assembly. The camera assembly includes a controlling unit which includes pan motor controlling means for controlling pan motor driving means so as to have the pan motor driving

means drive a pan motor in response to a predetermined upper-limiting pan value "O pmax".

The applicant's admitted prior art fails to discloses a surveillance camera apparatus comprising a controlling unit for controlling the pan motor to allow the imaging unit to be pivotally moved around the pan axis of the pan shaft within a range depending on the shape of the opening.

As shown in FIG. 14, the predetermined upper-limiting pan value " $\Theta$  pmax" is defined as a fixed value without depending on the current tilt angle of the imaging unit, or without depending on the shape of the opening. As a result, the housing assembly tends to prevent the imaging unit from taking an image of an object when the imaging unit is moved around the pan axis of the pan shaft.

The surveillance camera apparatus defined in currently amended claim 1 is completely different in construction from the applicant's admitted prior art.

Further, the surveillance camera apparatus defined in currently amended claim 1 can obtain an advantageous effect of allowing the imaging unit to be moved around the pan axis of the pan shaft in consideration of a dead angle without preventing the imaging unit from taking the image of the object through the opening of the slanted plate portion of the housing assembly.

In contrast, the applicant's admitted prior art cannot expect the advantageous effect of the surveillance camera apparatus defined in currently amended claim 1.

It will, therefore, be appreciated from the foregoing description about the surveillance camera apparatus defined in currently amended claim 1 completely different in construction and advantageous effect from the applicant's admitted prior art that the surveillance camera

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apparatus defined in currently amended claim 1 is patentably distinguishable over the applicant's admitted prior art.

Claim 2 is dependent on currently amended claim 1 which is believed to be patentably distinguishable over the applicant's admitted prior art as will be understood from the previously mentioned reasons. It is, therefore, believed that claim 2 is patentably distinguishable over the applicant's admitted prior art based on the same reasons as above.

The examiner has rejected claim 3-8, 17-20, 23-27 under 35 U.S.C. 102(b) as being anticipated by or, in the alternative, under 35 U.S.C. 103(a) as obvious over the applicant's admitted prior art.

Claims 4, 6, and 7 are dependent on currently amended claim 1. Claims 3 and 23 are dependent on currently amended claim 2. Claims 9, 10, 11, 17, 18, 19, and 20 are dependent on claim 3. Claim 5 is dependent on claim 4. Claim 8 is dependent on claim 7. Claims 12 and 14 are dependent on claim 10. Claim 13 is dependent on claim 9. Claim 21 is dependent on claim 13. Claim 22 is dependent on claim 14. Claims 24, 25, 26, and 27 are dependent on claim 23. It is, therefore, believed that claim 3-8, 17-20, 23-27 are patentably distinguishable over the applicant's admitted prior art based on the same reasons as above.

In view of the foregoing description, it is respectfully submitted that the present application is thus in condition for allowance.

If any fees are required by this communication which are not covered by an enclosed check, please charge such fees to our Deposit Account No. 16-0820, Order No. 35846.

Respectfully submitted,

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